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September 10, 1991

**Donna R. Searcy, Secretary
Federal Communications
1919 M Street, N.W., Room 222
Washington, DC 20036**

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**Federal Communications Commission
Office of the Secretary**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554**

In the Matter of

**Amendment of Part 74 of
the Commission's Rules
and Regulation's Rules
and Regulations with
Regard to the Low Power
Television Service**

RM-7772
~~Room 772~~

To: the Commission

Channel America is a broadcast television network serving over 100 stations, coast-to-coast, via low power broadcasters, full power broadcasters and cable operators. We are aware of the Community Broadcasters Association petition for rule making and their interest in being included in "must carry" if it is reinstated. We have had significant hands on relationships with LPTV stations, as these make up the largest portion of our network. LPTV operators have been the champions of localism in their proactive work in developing local programming which clearly serves the public interest. LPTV operators have invested their time and capital into their community without subscriber fees and without primary status as a broadcaster. Their efforts should not go unnoticed and these stations need a fighting chance to build a sustaining business to continue serving their communities.

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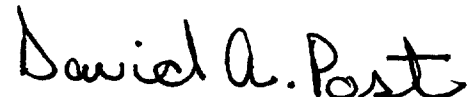
Channel America has, in response to the efforts at the local level led by LPTV operators, instituted a two-tier programming format whereby we deliver network program segments that affiliate stations "localize" for their community. We have received strong support on this project, including strong interest from national advertisers who are looking for methods to tie in their local dealers on an active basis.

We believe that localism is a key opportunity for the 1990's. Don't shut out the people who can make it happen.

Channel America Television Network hereby submits these comments on the Petition for Rule Making (RM-7772) filed by the Community Broadcasters Association ("CBA") on June 10, 1991.

Copies of this filing have been sent today by first class United States mail, postage prepaid, to Peter Tannenwald, Esq., Arent, Fox, Kinter, Plotkin and Kahn, 1050 Connecticut Avenue, N.W., Washington, DC 20036-5339, and the Community Broadcasters Association, P.O. Box 26736, Milwaukee, WI 53226.

Respectfully Submitted,
Channel America
Television Network



David A. Post
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DAP/je